



Coalition for Sensible Solar Regulation

Energy & Technology Committee

Public Hearing March 3, 2022

Testimony Submitted and Presented by Mark Scully

Raised: S.B. 176—An Act Concerning Shared Clean Energy Facilities Support with Modification

Thank you for the opportunity to submit testimony regarding An Act Concerning Shared Clean Energy Facilities, S.B. 176. **The Coalition for Sensible Solar Regulation is pleased to support this bill with certain modifications.** Foremost among these changes is an increase in the commercial solar cap from 50 to 100 megawatts (MW) per year. This change can be easily accomplished this session and will yield direct economic benefits to Connecticut businesses and municipalities. It will enhance energy equity and lead to a lower-cost electric grid for ratepayers. Our detailed comments regarding S.B. 176 are below.

SCEF Cap Increase: Support with Modification

We support the various changes to Shared Clean Energy Facility (SCEF) contained in S.B. 176 and propose the following modifications:

- We request that the size of the program be doubled, from 25 to 50 MW.
- We call for removing the sunset provision of this program
- We recommend striking the requirement that 40% of projects be located in environmental justice communities. Such communities are frequently overburdened by energy infrastructure, and siting SCEFs in these communities could add to that burden without providing community benefits.

EDC Ownership of SCEF Solar Generation Facilities: Support with Modification

We are concerned that permitting electric distribution companies (EDCs) to own SCEF solar facilities represents a sudden and radical change to decades of established deregulatory policy. Such a departure from established policy requires, in our view, a stakeholder review process, led by the Public Utility Regulatory Authority (PURA,) to address potential procedural and competitive concerns, including:

- The EDC's role administering the SCEF program, giving it unfair access to competitive bid information,
- The EDC's role overseeing interconnections,
- The EDC's favorable cost of capital vis a vis competitors,
- The EDC's access to rights of way adjacent to substations.

Use of Entire Roof Space: Support with Modification

We support allowing commercial and industrial customers in the non-residential renewable energy tariff program (NRES) to use their entire roof space for generation, and suggest also



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enabling them to use their **parking lots and grounds** for solar canopies. The proposed limit of 5 MW for a generation project provides sufficient safeguard against use of this tariff program for excessively sized projects. In addition, it is important that such projects receive equal property tax treatment across the state. Such uniformity will remove uncertainty and confusion as these changes are introduced.

It is worth noting that allowing businesses to use their whole roof space will not lead to more solar deployments without an increase in the cap on this program.

Commercial Cap Increase: New Modification

We call for the size of the Non-Residential Renewable Energy Tariff (NRES) program to be doubled from 50 to 100 MW per year. The NRES program is the successor to the LREC/ZREC and Virtual Net Metering (VNM) programs, and as such is the primary vehicle for advancing non-residential solar on the premises of commercial and industrial customers, municipalities, state facilities and agricultural customers.

A program cap of 50 MW per year has proven to be wholly inadequate to the demand and to the state's abilities to reach its climate targets. Currently, over half of commercial business owners and municipalities are prevented from lowering their energy costs through solar. Moreover, Connecticut's ranking in solar job creation is among the lowest amongst active solar states.

- We urge the members of the Energy & Technology Committee to make this modest increase in the program now and to consider removing such program caps in the future, thereby giving PURA the capability to design and implement programs to reach targets set by the Committee.

Solar Canopy Adder: New Modification

We propose an NRES program adder of 6 cents per kWh for solar canopies, unleashing the benefits of this valuable resource

The **Coalition for Sensible Solar Regulation** is a broad group of municipal officials, business leaders and environmental organizations representing over 75,000 CT residents, ready and willing to build the commercial and community solar projects this state needs. (For more information, go to <http://solarforct.org/>.)

350CT
Acadia Center
AEC Solar
Audubon Connecticut
Branford Clean Energy



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Clean Feet Investors
Clean Water Action
Common Sense Fund
Connecticut Solar & Storage Association
Conservation Law Foundation
CT Conference of Municipalities
CT Green Building Council
CT League of Conservation Voters
CT Roundtable on Climate and Jobs
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